

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No. 4:14CR00187 JAR/DDN
)
PAMELA TABATT, *et. al.*,)
)
Defendants.)

**DEFENDANTS' MOTION FOR LEAVE TO FILE
OVERLENGTH JOINT MOTION TO DISMISS**

COME NOW Defendants by and through their undersigned counsel, and pursuant to E.D.Mo. L.R. 7-4.01(D), respectfully seek leave of the Court to file a brief which exceeds 15 pages in length. In support of this motion, Defendants state as follows:

1. Defendants have filed their Motion to Dismiss Count I of the Indictment on the Grounds that It Fails to State an Offense and That 21 U.S.C. § 813 and 21 U.S.C. § 802(32)(A) Are Unconstitutionally Vague as Applied to Defendants Or, In the Alternative, to Strike Certain Substances from the Indictment.

2. Defendants' motion includes a memorandum in support within it. Defendants' counsel have collaborated to present one motion on behalf of all Defendants.

3. Significant space is required to adequately present the issues and argument contained in the Motion, many of which have important technical underpinnings. Defendants' memorandum in support of their motion exceeds the fifteen pages permitted under L.R. 7-4.01(D).

WHEREFORE, Defendants respectfully request this Court enter an Order granting them leave to file their Motion to Dismiss Count I of the Indictment, which exceeds 15 pages in length.

Dated: October 8, 2015

Respectfully submitted,

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Certificate of Service

I hereby certify that on October 8, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

James Delworth
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e/s John M. Lynch